

### **REMARKS**

In the specification, the abstract has been amended to correct minor editorial problems.

Claims 1-36 are currently in the case.

The citations neither disclose nor suggest the present invention. The independent claims (Claims 1, 23, 26, 29, 32 and 33) have however been amended to further highlight distinguishing features over the prior art. New claims 34, 35 and 36 have also been added which are clearly supported by the description.

The present invention relates to material handling systems in which product is manually processed by an operator at a work station. A batch of product is delivered to an operator workstation on an "as required" or "on demand" basis (e.g. after the operator has finished a previous batch of product), and individual packing containers are also delivered to the operator workstation on an "as required" or "on demand" basis (e.g. after the operator has finished filling a packing container with a portion of the product that the operator has processed from a received batch of product).

The two cited patents relate to very different systems to that of the present application. They relate to automated processes that are specifically designed so as to remove the need for manual operations. They also relate only to packaging product, and not to systems where a product must also be processed. Further they do not relate to systems where product is simultaneously processed and packaged at the same workstation. In the citations, product is not delivered in batches, but individual product units are delivered continuously one after the other to a packing station on a conveyor line. Furthermore, as everything is carried out continuously in accordance with set timing regimes and without human intervention, there is no "as required" or "on demand" delivery.

The present claims 1 and 23 recite an operator workstation at which both the processing of product and the packaging of product takes place, and further specifies that the automatic “as required” or “on demand” delivery of batches of product and of packing containers are to this operator workstation. Thus, a single operator is able to work at a single workstation to both process and pack product in any efficient and timely manner, with both the batches of product and the packing containers being delivered to the operator as needed, such that the operator is able to continually process product from the batches of product and to pack product from a batch in a packing container without needing to leave their station or to wait for product or packing containers.

In contrast to the present invention, US 6438928 aims to remove manual labour from the packing of containers, and is limited to the packaging of soft, pliable and stackable items, such as plastic bags, into boxes whose cross-sections correspond to the footprint of the product. The present invention aims to facilitate the manual processing and packaging of product, and is designed to cope with cuts of meat and the like. It delivers product in batches to operator workstations at which product in the batch is processed and mixed and matched to provide a suitable amount of final product for an individual packing container.

With regard to some of the specific features identified in the Office Action, the Office Action suggests that 10A-10C of the citation are batches of product, but 10A-10C are boxes into which objects 44 are packed. It cannot be understood how an empty box 10A-10C could be considered a batch of product, as there is neither product nor batch. Furthermore, if boxes 10A-10C are somehow considered batches of product (whether empty or full), then the citation cannot be said to disclose any other features of the present claims, since these boxes are not delivered to a work-station for processing of a product and there are no packing containers that are filled with “product” of the “batches”. The Office Action suggests that the objects 44, e.g. plastic bag packs, are “packing containers”, but in the citation it is the objects 44 themselves that are being packed away, which is completely at odds to how the “packing containers” of the present claims are used. There is no suggestion in the citation that the objects 44 are filled with any product or that any product is provided to a work-station on demand to fill the objects 44. Certainly, the

boxes 10A-10C are not delivered to a workstation to provide product for filling the bags 44, as would be required by the present claims. Furthermore, there is no “on request” or “on demand” delivery, rather individual objects are moved continuously along a conveyor and dropped into a box. Overall, the attempt to equate features of the citation with features of the current claims is strained, leads to inconsistencies in interpretation, and does not provide an anticipation of the current claim set.

The teachings of US 4398383 cannot make up for the lack of teaching in US 6438928. It too relates to a completely automated system that does not require any product processing, that specifically removes any manual involvement in the packaging, and that is again limited to a very specific product, i.e. filled sealed bags. Moreover, it relates to packaging these bags in a vertical orientation rather than in a stacked manner, and so is in conflict with US 6438928.

Overall, the citations relate to very different “product” and packaging systems, and have very different objectives to the present invention.

Claims 26, 29, 32 and 33 are also novel and inventive for the reasons discussed in relation to claims 1 and 23.

The present system also has many further advantageous features that are distinctive over the prior art. For example, the operator receives a batch of product at the workstation in a batch container, and delivery is at a convenient access point for the operator, so that the operator can take the product directly from the delivery container, trim it and place it directly in the packing container. When empty, these delivery containers are automatically removed, and, when full, the packing containers are also automatically removed. Also, buffers are provided for both the batches of product and for the packing containers. Further, the packing containers are provided below an aperture in the workstation, which provides for a compact and uncluttered space and allows the container rim to remain clean. Other inventive features are that the various conveyor/transport mechanisms are provided on a central line along which the operator

workstations are positioned, and that these mechanisms are provided one above the other in a space-saving manner. The configurations of the transport mechanisms are also inventive.

Overall, the present system is fast, efficient, compact, flexible and expandable. It may take a modular form with as many workstations, as needed, in place or in operation. It may effectively track product in both a delivered batch and a packed container throughout the processing and packing.

Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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